

US EPA ARCHIVE DOCUMENT

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February 9, 2015

Kathleen H. Johnson, Director
Enforcement Division
U. S. Environmental Protection Agency
Region 9
75 Hawthorne Street
San Francisco, CA 94105-3901

Re: City of Indio Municipal Separate Storm Sewer System (MS4) Compliance Audit Report

Dear Ms. Johnson,

This letter is in response to the final compliance audit report, dated December 16, 2014, sent to the City regarding the audit conducted by the U.S. Environmental Protection Agency with PG Environmental, LLC, on August 14th and 15th, 2014. The City appreciates the time and effort the U.S. EPA has committed to this audit. The EPA listed several recommendations in the compliance report and the City understands the importance of these recommendations. The City views this experience as an opportunity to assess and advance the National Pollutant Discharge Elimination System (NPDES) program. The City also appreciates the opportunity to comment on the compliance audit report, and would like to address the potential program deficiency noted.

Potential Program Deficiency:

It did not appear that the City was implementing inspector training or inspection and enforcement mechanisms to ensure adequate installation and maintenance of erosions and sediment controls to minimize the potential contribution of pollutants from Public Construction sites as required by Part F.d.ii.2 &4 of the Permit.

In order to ensure the adequate installation and maintenance of erosion and sediment controls to minimize the potential contribution of pollutants from public construction sites, the City's Qualified Stormwater Practitioner (QSP) will inspect these sites using stormwater specific inspection forms on a frequency that follows the guidelines of the permit and the 2014 Storm Water Management Plan. The City's QSP inspections will be in addition to the contractor inspections currently utilized on public construction sites. These inspections will begin immediately for public construction sites covered under the General Construction Permit. These forms, signed by the City's QSP, will help establish clear NPDES oversight of public construction sites in the future.

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If you have any questions or concerns, please contact me at (760) 625-1815 or via email at stoyoda@indio.org.

Sincerely,

Sara Toyoda

Sara Toyoda
City of Indio
Environmental Programs Coordinator

cc: Juan Raya
Interim Public Works Director/City Engineer
City of Indio

Dan Martinez
City Manager
City of Indio

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